

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. Nos. 28846, 29857 & 30064

**CERTIFICATION OF COUNSEL**

I, Kimberly A. Brown, counsel to the FTX Recovery Trust<sup>2</sup>, hereby certify as follows to the best of my knowledge, information and belief:

1. In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435], entered January 9, 2023 (the “Interim Compensation Order”), and the *Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses* [D.I. 834], entered March 8, 2023 (the “Fee Examiner Order”), Sullivan & Cromwell LLP (“S&C”) filed the *Eighth Interim Fee Application of Sullivan & Cromwell LLP* [D.I. 28846] (the “Interim Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

---

<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

2. Pursuant to the notice attached to the Interim Application [D.I. 28846-7], objections to the Interim Application, if any, were to be filed and served no later than January 6, 2025 (the “Objection Deadline”).

3. Pursuant to the Fee Examiner Order, on March 4, 2025, Katherine Stadler (the “Fee Examiner”) filed the *Fee Examiner’s Summary Report on Fee Review Process and Eighth Interim Fee Applications* [D.I. 29857] (the “Interim Report”) with respect to certain fee applications, including the Interim Application. As stated in the Interim Report, S&C and the Fee Examiner agreed to defer consideration of the Interim Application to the April omnibus hearing while discussions regarding certain issues identified by the Fee Examiner in the Interim Report (the “Reserved Issues”) continued among the parties. As set forth in the *Fee Examiner’s Summary Report on Final Fee Applications* [D.I. 30064] (the “Final Report”), S&C and the Fee Examiner engaged in extensive discussions with regard to, among other things, the pending Interim Application and have resolved all of the Reserved Issues pursuant to certain agreed reductions as set forth in the proposed form of order (the “Proposed Order”) attached hereto as **Exhibit A**.

4. The undersigned hereby certifies that the Court’s docket has been reviewed and no answer, objection, or other responsive pleading to the Interim Application, other than the Interim Report, appear thereon.

5. A copy of the Proposed Order approving the Interim Application has been circulated to the Fee Examiner and the Office of the United States Trustee (together, the “Parties”). The Parties have advised that they do not oppose entry of the Proposed Order.

6. In accordance with the Court’s electronic order processing procedures, a clean copy of the Proposed Order shall be uploaded to CM/ECF.

WHEREFORE the undersigned, on behalf of the FTX Recovery Trust, respectfully request the Proposed Order be entered at the Court's earliest convenience.

Dated: April 11, 2025  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Kimberly A. Brown

Adam G. Landis (No. 3407)  
Kimberly A. Brown (No. 5138)  
Matthew R. Pierce (No. 5946)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
E-mail: landis@lrclaw.com  
brown@lrclaw.com  
pierce@lrclaw.com

-and-

**SULLIVAN & CROMWELL LLP**

Andrew G. Dietderich (admitted *pro hac vice*)  
James L. Bromley (admitted *pro hac vice*)  
Brian D. Glueckstein (admitted *pro hac vice*)  
Christian P. Jensen (admitted *pro hac vice*)  
125 Broad Street  
New York, NY 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
E-mail: dietdericha@sullcrom.com  
bromleyj@sullcrom.com  
gluecksteinb@sullcrom.com  
jensenc@sullcrom.com

*Counsel to the FTX Recovery Trust*